

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,  
PFEFFER, BONCHI & GILL**

***A Professional Corporation***

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Northfield, New Jersey 08225

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Attorneys for City of Paterson (57842-10)

**BY:** /s/ Francis J. Ballak

*FRANCIS J. BALLAK, ESQ. (FJB2746)*

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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IN RE:	:	CHAPTER 7
	:	
	:	CASE NO. 17-15942
<b>ANTHONY OTTILIO,</b>	:	
	:	
<i>Debtor.</i>	:	JUDGE: Hon. Michael B. Kaplan

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**NOTICE OF MOTION TO FOR RELIEF FROM AUTOMATIC STAY**

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**TO:**

Kenneth J. Rosellini  
636A Van Houten Avenue  
Clifton, NJ 07013  
*Attorney for Debtors*

U.S. Trustee  
US Dept of Justice  
Office of the US Trustee  
One Newark Center Ste 2100  
Newark, NJ 07102

Andrea Dobin,  
McManimon Scotland & Baumann, LLC  
427 Riverview Plaza  
Trenton, NJ 08611  
*Ch. 7 Trustee*

Anthony Otilio  
511 Passaic Ave  
Spring Lake, NJ 07762  
*Debto*

Stuart Gold  
Mandelbaum Salsburg et. al.  
155 Prospect Avenue  
West Orange, NJ 07052  
*Creditor – Valley National Bank*

Sherri Jennifer Smith  
Phelan, Hallinan, Diamond & Jones  
400 Fellowship Road  
Mt. Laurel, NJ 08054  
*Creditor - U.S. BANK TRUST, N.A., AS TRUSTEE  
FOR LSF8 MASTER PARTICIPATION TRUST BY  
CALIBER HOME LOANS, INC.*

Andrew L. Spivack  
Phelan Hallinan Diamond & Jones, PC  
400 Fellowship Road  
Suite 100  
Mt. Laurel, NJ 08054  
*Creditor - U.S. BANK TRUST, N.A., AS TRUSTEE  
FOR LSF8 MASTER PARTICIPATION TRUST*

Richard James Tracy, III  
Schiller, Knapp, Lefkowitz & Hertzell LLP  
30 Montgomery Street  
Suite 1205  
Jersey City, NJ 07302  
*Creditor – T.D. Bank, N.A.*

Allen J. Underwood, II  
Becker, Meisel LLC  
Eisenhower Plaza II  
354 Eisenhower Pkwy., Suite 1500  
Livingston, NJ 07039  
*Creditor – Guadalupe Fressie & Bascom  
Corporation*

City of Paterson  
c/o Kathleen Gibson, CTC  
155 Market Street  
Paterson, NJ 07505  
*Creditor*

**PLEASE TAKE NOTICE** that on **Tuesday, December 17, 2018**, at **10:00 a.m.** in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for the City of Paterson shall move before the United States Bankruptcy Court, at 402 E. State Street, Trenton, New Jersey 08608, before the Honorable Michael B. Kaplan, U.S.B.J. for an Order granting relief from the automatic stay pursuant to 11 U.S.C. §§362(d)(1).

Movant shall rely upon the Statement of Counsel with attached Exhibits.

Movant requests oral argument in the event opposition is filed.

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,  
PFEFFER, BONCHI & GILL**  
Attorneys for City of Paterson

/s/ Francis J. Ballak  
*FRANCIS J. BALLAK, ESQ. (FJB2746)*

Dated: November 20, 2018